

REDACTED**SEALED**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISIONU.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED

JUN 10 2020

UNITED STATES OF AMERICA

v.

JIMMY DON JONES (01)

No. 4:20-MJ-

390

CLERK U.S. DISTRICT COURT
By: _____
Deputy**CRIMINAL COMPLAINT**

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Between on or about November 11, 2019 and April 7, 2020, in the Fort Worth Division of the Northern District of Texas, **Jimmy Don Jones**, the defendant, knowingly transported using any means and facility of interstate and foreign commerce, including by computer, any child pornography.

Specifically, **Jones** transported, using the Internet, the following images of child pornography:

File Name	File Description
██████████46.jpg	This image depicts the penis of an adult male touching the mouth of a prepubescent female, approximately 2-4 years old, with a white liquid resembling semen on her face.
██████████d6.jpg	This image depicts a prepubescent female toddler, approximately 1-2 years old, lying on her back with her genitals visible and her legs spread apart. An adult male's penis is penetrating her mouth.
166.jpg	This image depicts a nude prepubescent female, approximately 3-5 years old, lying on her back with an adult male's penis pressing against her vagina.

192.jpg	This image depicts a nude prepubescent female, approximately 4-6 years old, lying on her back. An adult male's penis is penetrating her anus.
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In violation of 18 U.S.C. §§ 2252A(a)(1) and 2252A(b)(1).

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), Dallas Division and have been employed as a Special Agent of the FBI since April 2004. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States. I am currently assigned to a Crimes Against Children Task Force, wherein my duties and responsibilities include investigating criminal violations relating to the sexual exploitation of children (SEOC). I have gained expertise in these types of investigations through training in seminars, classes, and my everyday work. In addition, I have received specialized training in the investigation and enforcement of federal child pornography laws in which computers are used as the means for transmitting, collecting and storing child pornography.

2. The information contained in this affidavit is based on my personal knowledge and experience, my own investigation, and information provided by other law enforcement officers and/or agents. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation.

I have set forth only the facts that I believe are necessary to establish probable cause to believe that a violation of Transportation of Child Pornography, in violation of 18 U.S.C. § 2252A(a)(1), has been committed by **Jimmy Don Jones**.

OVERVIEW OF INVESTIGATION

3. On April 30, 2020, Arlington Police Detective Nathan Bishop received multiple related CyberTip (CT) reports previously submitted to the National Center for Missing and Exploited Children (NCMEC). NCMEC believed the six CT reports, submitted by a social media company called "M[REDACTED]," were related to the same offender. M[REDACTED] reported multiple user accounts had uploaded files of child pornography using its service from November 11, 2019 to April 7, 2020. The CT reports included the following account identifiers with the reported accounts:

CT Report Number	User Name	Email Address
59663418	[REDACTED]air	[REDACTED]52@gmail.com
59844699	[REDACTED]Eye	[REDACTED]air@protonmail.com
64133699	[REDACTED]rke	[REDACTED]29@yahoo.com
65645871	[REDACTED]ddy	[REDACTED]00@gmail.com
67946541	[REDACTED]ton	[REDACTED]ton@gmail.com
68090471	[REDACTED]ddy	[REDACTED]38@gmail.com

4. Each of the CT reports included files of suspected child pornography that were uploaded by the user. Det. Bishop reviewed the files and observed the following files, which appeared to depict real minors engaged in sexually explicit conduct, from the associated CT reports:

CT Report	File Name	File Description
59663418	██████████46.jpg	This image depicts the penis of an adult male touching the mouth of a prepubescent female, approximately 2-4 years old, with a white liquid resembling semen on her face.
64133699	██████████d6.jpg	This image depicts a prepubescent female toddler, approximately 1-2 years old, lying on her back with her genitals visible and her legs spread apart. An adult male's penis is penetrating her mouth.
68090471	166.jpg	This image depicts a nude prepubescent female, approximately 3-5 years old, lying on her back with an adult male's penis pressing against her vagina.
68090471	192.jpg	This image depicts a nude prepubescent female, approximately 4-6 years old, lying on her back. An adult male's penis is penetrating her anus.

5. The IP addresses used for these accounts included internet hosting companies in several countries. Your Affiant believes this is indicative of a user using a service such as a virtual private network (VPN) to navigate the Internet while masking the true origin IP address of the user.

6. The CT reports also included prior investigative information conducted by FBI Special Agents and Analysts acting as liaisons with NCMEC. These personnel submitted subpoenas to Google, Charter Communications, T-Mobile, and Verizon Wireless for account details and subscriber information relating to IP addresses reported in the CyberTips.

7. Det. Bishop reviewed the IP addresses and account identifiers from the subpoena responses and determined that the Google accounts had common IP addresses, indicating the same end user likely created and was using the accounts. The common IP addresses and the subscriber's name and address are listed below:

IP Address	Account Name	Subscriber
97.93.183.82	██████████38@gmail.com	Shields Industrial Supply 2400 Cullen St Fort Worth TX 76107
	██████████29@yahoo.com	
	██████████00@gmail.com	
	██████████ton@gmail.com	
	██████████65@gmail.com	
	██████████52@gmail.com	
67.10.243.250	██████████29@yahoo.com	Servies Jones Drafting ██████████Amberway Dr Arlington TX 76014
	██████████52@gmail.com	
	██████████ton@gmail.com	

8. CT Report 59663418 indicates that the Google account

██████████52@gmail.com utilized the recovery email of ██████████65@gmail.com, both of which were accounts used at various times by the M ██████████ account referenced in the

CyberTips. The subpoena return from Google further identifies logins to the

██████████52@gmail.com account from T-Mobile and Verizon Wireless. The subpoena return for those IP addresses from T-Mobile resolve to:

- a. Subscriber: JIMMY JONES
- b. Address: 2400 Cullen Street, Fort Worth, Texas

The subpoena returns for those IP addresses from Verizon Wireless resolve to:

- c. Subscriber: JACQUE JONES
- d. Address: ██████████Amberway Drive, Arlington, Texas

9. Det. Bishop searched law enforcement databases and determined that a person named **Jimmy Don Jones**, date of birth [redacted]1968, resides at ██████████Amberway Drive, Arlington, Texas. Jones is a registered sex offender. His sex offender registration lists his residence as ██████████Amberway Drive and that he is employed with a business named "Texas Drafting Services" at his same home address. A Texas Workforce Services search for Jones showed employment at Shields Industrial Supply. The phone number ██████████-1145 is the primary phone number provided by **Jimmy Jones** for his sex offender registration.

10. Based on the above information, Det. Bishop obtained a search warrant for the residence at ██████████Amberway Drive, Arlington, Texas. This warrant was executed on June 9, 2020. On this day, Jones was interviewed by Det. Bishop and placed under arrest and charged with the state violation of Promotion of Child Pornography. Jones was transferred to the Tarrant County Jail at 100 Lamar Street, Fort Worth, Texas. Det. Bishop seized, among other items, a Samsung Galaxy Note 9 and a Coolpad cellular phone.

Det. Bishop determined that the IMEI numbers for the Samsung Galaxy Note 9 and the Coolpad phone match those in the Verizon and T-Mobile subpoena responses to NCMEC, respectively.

11. On June 9, 2020, SA Thompson interviewed **Jimmy Jones** at the Tarrant County Jail. **Jones** was read his *Miranda* rights, acknowledged understanding those rights, and agreed to answer questions.

12. **Jones** stated he has an addiction to child pornography. He stopped viewing child pornography for about seven years but started actively trafficking in child pornography again in about 2015. Since then he used various phone applications, including M [REDACTED], to communicate with others about child pornography and to view, receive, and distribute files of child pornography.

13. **Jones** would use these applications from his Samsung Galaxy Note 9 phone and the Coolpad phone. **Jones** said M [REDACTED] is no longer installed on his phone since M [REDACTED] cancelled his account a few months ago for violations of terms of service. The account [REDACTED]52@gmail.com is **Jones's** account and is currently connected to the Samsung Galaxy Note 9 and the Coolpad phone. **Jones** confirmed that the phone number to his Samsung Galaxy Note 9 phone is [REDACTED]-1145, the same number listed on his sex offender registry.

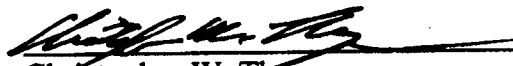
14. **Jones** said he would access and distribute child pornography "95 - 99 percent of the time" from his place of employment, Shields Industrial Supply. He would use the apps while in his private office and sometimes on the drive home. If he didn't trade child pornography at work he would do so in the bathroom of his home in Arlington, Texas, where his wife could not observe him. **Jones** stated that he never traded child pornography anywhere besides these two locations or in his car between the two locations.

15. Jones estimated that law enforcement would find approximately 1000 images and videos of child pornography on his cellular devices. He could not recall the specific files identified in the CyberTips because "there are just so many."


16. Your Affiant is aware that Jones's place of employment and residence are both in the Northern District of Texas. Your Affiant is also aware that the descriptions of the images provided by Det. Bishop and listed in paragraphs one and four meet the federal definition of child pornography. Further, in order to upload the previously referenced images to Jones's M [REDACTED] account, Jones had to use the Internet, which is a means and facility of interstate and foreign commerce.

CONCLUSION

17. Based on the foregoing facts and circumstances, there is probable cause to believe that between on or about November 11, 2019 and April 7, 2020, in the Northern District of Texas, Jimmy Don Jones knowingly used a means and facility of interstate commerce to transport child pornography, in violation of 18 U.S.C. §§ 2252A(a)(1) and 2252A(b)(1).


Christopher W. Thompson
Special Agent
Federal Bureau of Investigation

Subscribed and sworn before me this 10th day of June 2020, at 10:31 am, in Fort Worth, Texas.


HAL R. RAY, JR.
United States Magistrate Judge